

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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| CLAUDE V. LEWIS, | : | Civil Action No. 1:14-cv-02302(CRK)(KNF) |
| | : | |
| Plaintiff, | : | |
| | : | |
| -against- | : | (ECF Case) |
| | : | |
| AMERICAN SUGAR REFINING, INC., | : | CERTIFICATION OF MICHAEL T. |
| and MEHANDRA RAMPHAL, | : | HENSLEY, ESQ. IN SUPPORT OF MOTION |
| | : | TO BIFURCATE |
| | : | |
| Defendants. | : | |

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MICHAEL T. HENSLEY, hereby certifies as follows:

1. I am a Principal of the firm Bressler, Amery & Ross, P.C. attorneys for Defendants American Sugar Refining, Inc. and Mehandra Ramphal (“Defendants”), and I make this Certification in support of Defendants’ Motion to Bifurcate, and to place before the Court certain documents referenced in Defendants’ Memorandum of Law in support of the Motion to Bifurcate. I have personal knowledge of the facts stated herein.

2. Annexed hereto as Exhibit A is a true and correct copy of the relevant pages of trial transcript, 477:12 – 478:8 and 749:5-7, for the matter captioned *Rosanna Mayo-Coleman v. American Sugar Holding, Inc. et al.*, Civil Action No.:14-cv-0079 (the “Coleman Litigation”).

3. Annexed hereto as Exhibit B are true and correct copies of news articles related to the verdict in the Coleman Litigation from the following sources; New York Daily News (March 6, 2018), New York Law Journal (March 7, 2018), Westchester Magazine (March 14, 2018).

4. Annexed hereto as Exhibit C is a true and correct copy of a Tweet by the official Time’s Up Twitter Account regarding the verdict in the Coleman Litigation, with a reply and retweet by the Twitter Account of Gabrielle Vinci.

5. Annexed hereto as Exhibit D is a true and correct copy of *Dollman v Mast Indus.*, 2011 US Dist LEXIS 99802 (S.D.N.Y. Sep. 6, 2011).

6. Annexed hereto as Exhibit E is a true and correct copy of *Tyco Int'l Ltd. v. Walsh*, No. 02-cv-4633, 2010 U.S. Dist. LEXIS 79019 (S.D.N.Y. July 30, 2010).

7. Annexed hereto as Exhibit F is a true and correct copy of *L-3 Commc'ns Corp. v. OSI Sys., Inc.*, No. 02-cv-9144, 2006 U.S. Dist. LEXIS 19686 (S.D.N.Y. Apr. 13, 2006).

8. Annexed hereto as Exhibit G is a true and correct copy of *In re WorldCom, Inc. Sec. Litig.*, No. 02-cv-3288, 2005 U.S. Dist. LEXIS 3144 (S.D.N.Y. Mar. 3, 2005).

Dated: March 22, 2018
New York, New York

/s/ Michael T. Hensley
Michael T. Hensley, Esq.